

Theodore H. Frank (SBN 196332)  
**CENTER FOR CLASS ACTION FAIRNESS**  
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*Attorneys for Objectors Theodore H. Frank and Sam Kazman*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANGEL FRALEY; PAUL WANG; SUSAN  
MAINZER; JAMES H. DUVAL, a minor, by and  
through JAMES DUVAL, as Guardian ad Litem; and  
W.T., a minor, by and through RUSSELL TAIT, as  
Guardian ad Litem, individually on behalf of and all  
others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a corporation; and DOES 1-  
100,

Defendants,

THEODORE H. FRANK; SAM KAZMAN

Objectors.

Case No. CV-11-01726 RS

**DECLARATION OF SAM KAZMAN**

Date: June 28, 2013  
Time: 10:00 a.m.  
Courtroom: 3  
Judge: Hon. Richard Seeborg

1 I, Sam Kazman, declare as follows:

- 2 1. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would  
3 testify competently to them.
- 4 2. My mailing address is 1899 L Street NW, 12th floor, Washington, DC 20036 and my business phone  
5 number is 202-331-1010. My email address is skazman@cei.org.
- 6 3. I am a United States resident who has had a Facebook account for years; I use the "like" button on  
7 many things on Facebook. I received a class notice in my email informing me that I am a class  
8 member. On information and belief, I was featured in a sponsored story during the class period. I  
9 have seen a screenshot where I was named in a sponsored story in April 2013.
- 10 4. Because of this, I am a class member as defined in the class notice. I filed a claim with a GCG Claim  
11 Number: 1757872 and GCG Control Number: 3151685699.
- 12 5. I have recently used existing Facebook privacy settings to opt out of appearing in sponsored stories.

13 I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and  
14 correct.

15 Executed on May 2, 2013 in Washington, DC.

16  
17  
18   
19 Sam Kazman